

76-912

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Rec'd

13 Feb 76

ORLANDO NUNEZ DE VILLAVICENCIO,
Y DEL TORO, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
et al.,

Defendants.

C. A. No. 75-1863

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75-3074

L-9

PLAINTIFFS' FIRST SET OF INTERROGATORIES

To: William E. Colby
c/o Jonathan B. Smith, Esquire
U. S. Department of Justice
Washington, D. C. 20530

I. DEFINITIONS

The term "document" or "documents" as used in these interrogatories includes, without limitation, whether original, copy or draft, each of the following: contracts, agreements, memoranda, assignments, licenses, minutes of meetings, minute books, books of account, orders, invoices, statements, computation sheets, notebooks, reports, medical prescriptions, communications of any kind (except oral), letters, notes (in pencil, ink or type-written), notes or records of oral communications, instructions, telegrams, and other messages, and writings and printed material of every kind, whether or not the document is privileged or within defendant's possession, custody or control.

In response to a request for identification of a document, furnish the following: (a) the name and date of the document; (b) the name and address of the person originating the document; (c) the name and address of the person, if any, to whom the document was addressed; (d) the names and addresses of all persons to whom copies of the document were to be, or have been, sent;

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ORLANDO NUNEZ DE VILLAVICENCIO,)
Y DEL TORO, et al.,)
Plaintiffs,)
v.) C. A. No. 75-1863
UNITED STATES OF AMERICA,)
et al.,)
Defendants.)

PLAINTIFFS' FIRST SET OF INTERROGATORIES

To: The Central Intelligence Agency
c/o Jonathan B. Smith, Esquire
U. S. Department of Justice
Washington, D. C. 20530

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UNITED STATES DISTRICT COURT
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ORLANDO NUNEZ DE VILLAVICENCIO,)
Y DEL TORO, et al.,)
Plaintiffs,)
v.) C. A. No. 75-1863
UNITED STATES OF AMERICA,)
et al.,)
Defendants.)

PLAINTIFFS' FIRST SET OF INTERROGATORIES

To: The Attorney General of the United States
c/o Jonathan B. Smith, Esquire
U. S. Department of Justice
Washington, D. C. 20530

I. DEFINITIONS

The term "document" or "documents" as used in these interrogatories includes, without limitation, whether original, copy of draft, each of the following: contracts, agreements, memoranda, assignments, licenses, minutes of meetings, minute books, books of account, orders, invoices, statements, computation sheets, notebooks, reports, medical prescriptions, communications of any kind (except oral), letters, notes (in pencil, ink or type-written), notes or records of oral communications, instructions, telegrams, and other messages, and writings and printed material of every kind, whether or not the document is privileged or within defendant's possession, custody or control.

In response to a request for identification of a document, furnish the following: (a) the name and date of the document; (b) the name and address of the person originating the document; (c) the name and address of the person, if any, to whom the document was addressed; (d) the names and addresses of all persons to whom copies of the document were to be, or have been, sent;

(e) the firm or firms with which all such persons were connected at the date of the document; (f) whether the defendant has possession, custody or control of the original document or a copy thereof; (g) and if the defendant is not in possession, custody or control of the original or a copy, the name and address of the person having possession, custody or control of the original or a copy of the document; and (h) the occasion for and/or circumstances under which the document was prepared.

The term "person" or "persons" as used in these interrogatories includes, without limitation, any individual, association, partnership, corporation, firm or organization.

The term "client(s)" as used in these interrogatories includes, without limitation, any individual, association, partnership, corporation, firm or organization, domestic or foreign.

Where an interrogatory requests the identification of a person(s) or client(s), state the full name, title and present address, or if unknown, the last known address, of each such person(s) or client(s).

Where an interrogatory requests the identification, listing or description of an act or event, the following information as to each such act or event shall be included wherever applicable (a) date; (b) place; (c) identification of each person present and the name of the organization each represented or was connected with; and (d) what was said and/or done by each person.

Any document or other material required to be identified in response to these interrogatories which defendant believes protected by the attorney-client or other privilege shall be listed and identified with the appropriate explanation as to the privilege being claimed.

II. INTERROGATORIES

1. Is the break-in described in plaintiffs' Petition the same break-in referred to in the report to the President by the Commission on CIA activities within the United States submitted on June 6, 1975 and in particular, referred to on page 238 of that report in the fourth complete paragraph on that page?

2. Please list all documents that were made available to the Rockefeller Commission on CIA activities within the United States concerning the plaintiffs and their activities.

3. List the names of all CIA personnel who presented information to the Commission on CIA activities within the United States concerning the plaintiffs.

4. List all CIA employees who had knowledge or who approved of the Roland Studios break-in.

5. List all other Government agencies who were informed that this break-in was to take place or who were subsequently notified of this break-in.

6. What was the length of time and dates of the surveillance of the plaintiffs and their activities?

7. What was the exact day and time that the break-in of the Roland Studios took place during 1971?

8. List all CIA employees who visited plaintiffs before the break-in occurred. This list is to contain all CIA employees who visited plaintiffs in either a social or official capacity.

9. Was Orlando Nunez ever employed or did he ever act on behalf of the CIA at the Agency's request or as a contract employee?

10. Was Mr. Christopher Fitzgerald present at the time of the February, 1971 break-in?

11. List all CIA employees who participated in the actual break-in.
12. List all CIA employees who entered the Roland Studios at the time of the break-in.
13. List all employees who were near the break-in scene but did not enter the premises.
14. List all CIA employees who kept the plaintiffs under surveillance before and during the break-in.
15. List all CIA employees who were involved with the surveillance of the plaintiffs from the Friendship Grill.
16. List all CIA employees who were with the Corporal Robert Fleck of the Fairfax City Police Department in a marked Fairfax City Police car at Mundy's Esso station during the time of the break-in.
17. List all officials of the Fairfax City Police Department who were either informed in advance of the Roland Studios break-in or had knowledge of same.
18. List all members of the Fairfax City Police Department whose assistance was requested by the CIA in executing the break-in.
19. List all Fairfax City officials who were informed of the break-in either before or after it occurred by the CIA.
20. List all Fairfax City Police officials whose assistance was requested in the surveillance from Friendship Grill.
21. List all times and places of surveillance of the plaintiffs by the CIA.
22. List all the times and places of surveillance by the Fairfax Police Department which were furnished to the CIA.
23. Did William E. Colby have advance notice that the break-in would take place?
24. Did Richard M. Helms have advance notice that the break-in would take place?

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25. Does the CIA have any knowledge of any electronic surveillance either by the CIA, the Fairfax City Police Department, or any other source of the plaintiffs' photo studio or place of residence or electronic surveillance of plaintiffs in any other surroundings whatsoever?

26. In any instance, does the CIA have knowledge of the opening or inspection of the postal mail of the plaintiffs?

27. Did the CIA request Internal Revenue Service to make available tax returns of the plaintiffs for CIA inspection?

28. Did the CIA in any instance request information from any bank where plaintiffs and/or Roland Studios had bank accounts?

29. Describe the role of Chaos in the break-in or evidence surrounding it or the surveillance of the plaintiff.

30. Did the CIA make any attempt to obtain a search warrant for the purpose of entering plaintiffs' premises?

31. List each and every break-in, along with the time and place, of the Roland Studios or the residence of either plaintiff.

32. List each incident, time and place where plaintiffs' telephone conversations were recorded.

33. List each incident, time and place that electronic surveillance was used concerning the plaintiffs.

HURWITZ & ABRAMSON

By

Ely Hurwitz

Ronald E. Abramson

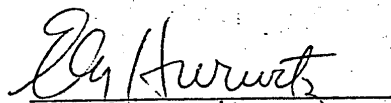
Ronald E. Abramson

1826 Jefferson Place, N. W.
Washington, D. C. 20036
785-1588

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Interrogatories were mailed, postage prepaid, to the following counsel on the 11 day of February, 1976.


Ely Hurwitz

Office of the Director
Central Intelligence Agency
Washington, D. C. 20505

Attorney General's Office of the
United States
Constitution Ave. between 9th & 10th Streets, N. W.
Washington, D. C.

Jonathan B. Smith, Esquire
U. S. Department of Justice
Washington, D. C. 20530

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9	D/DCI/NID				
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12	IG				
13	Compt				
14	D/Pers				
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